

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	: Chapter 11
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PURDUE PHARMA L.P., <i>et al.</i> ,	: Case No. 19-23649 (SHL)
	:
Debtors. ¹	: (Jointly Administered)
	:
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**SECOND SUPPLEMENTAL DECLARATION OF
ANN V. KRAMER IN CONNECTION WITH THE
DEBTORS' RETENTION AND EMPLOYMENT OF
REED SMITH LLP AS SPECIAL INSURANCE COUNSEL**

Ann V. Kramer, being duly sworn, states the following under penalty of perjury:

1. I am a Partner at Reed Smith LLP ("**Reed Smith**"), which maintains offices in 17 U.S. cities and 14 international cities, including the office at 599 Lexington Avenue, New York, New York, 10022.

2. On April 19, 2022, the Debtors filed the *Debtors' Application for Entry of an Order Pursuant to Sections 327(e) and 328(a) of the Bankruptcy Code Authorizing the Retention and Employment of Reed Smith LLP as Special Insurance Counsel, Nunc Pro Tunc to March 1, 2022* [ECF No. 4674] (the "**Application**").²

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014) (collectively, the "**Debtors**"). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

3. In connection with the Application, I filed a declaration (the “**Initial Declaration**”) describing Reed Smith’s billing policies and hourly rates. The Initial Declaration was appended to the Application as Exhibit A.

4. On May 18, 2022, this Court entered the *Order Granting Application Pursuant to Bankruptcy Code Sections 327(e) and 328(a) Authorizing Retention and Employment of Reed Smith LLP as Special Insurance Counsel, Effective March 1, 2022* [ECF No. 4850] (the “**Retention Order**”). I submitted a previous supplemental declaration in support of the Application on July 28, 2022 [ECF No. 4984].

5. In connection with the Application and Retention Order, I hereby submit this supplemental declaration (the “**Second Supplemental Declaration**”) to provide additional disclosures in accordance with rules 2014(a) and 2016(b) of the Bankruptcy Rules and as required under the Retention Order. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein.

6. In the Initial Declaration, I disclosed Reed Smith’s billing rates in effect at that time for matters related to the Chapter 11 Cases. I also disclosed that that the billing rates are subject to periodic adjustments, generally on or around January 1 of each year.

7. Paragraph 6 of the Retention Order requires Reed Smith to provide at least ten days’ notice of any increases in its hourly rates beyond the rates set forth in the Application to the Debtors, the United States Trustee and any Creditors’ Committee appointed in these cases, and to file such notice with the Court.

8. In the ordinary course, Reed Smith has adjusted the standard hourly rates charged by its professionals and paraprofessionals. Reed Smith's billing rates that will take effect as of January 1, 2023 for matters related to the Chapter 11 Cases, range as follows:

Billing Category	Range
Partners & Counsel	\$690 – \$1,785
Associates	\$375 - \$1,110
Paraprofessionals	\$250 - \$540

9. Consistent with past practice, Reed Smith expects to reach agreement with the Debtors regarding any discounts applicable to its 2023 billing rates for matters related to the Chapter 11 Cases during the first quarter of 2023.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct.

Dated: December 21, 2022
New York, New York

/s/ *Ann V. Kramer*

Ann V. Kramer
Reed Smith LLP